

Colorado Department of Health
Hazardous Materials & Waste Management Division

Comments

on

WORKPLAN FOR

CONTROL OF RADIONUCLIDE LEVELS IN

WATER DISCHARGES FROM THE ROCKY FLATS PLANT

JANUARY, 1992

and the

DOCUMENT REVIEW COMMENT RECORD

JANUARY, 1992

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Comments to the Workplan:

Section 2.5.3: The last sentence, first paragraph, regarding Segment 5, is incorrect and the classification of Segment 4 should be added. Acceptable replacement text is: Classifications of Segment 4 and Segment 5 are aquatic life, warm water (Class 2), water supply, agricultural and recreational Class 2.

Section 4.2.3.2: In reporting accidents or incidences, DOE must include remediation activities that may contribute radionuclide contamination to the surface water system. For example, earthwork could be impacted by heavy precipitation/runoff or high wind erosion before DOE is able to protect or containerize soils. Such an event may potentially contribute radionuclides to water that has been characterized under pre-release sampling procedures. Should this type of event occur, DOE must notify CDH to allow a determination of the validity of the pre-release water quality data. DOE must, at all times, maintain coordination and communication between the individuals or groups responsible for the performance of this work plan and the individuals or groups responsible for remediation activities to ensure reporting of such incidences. These coordination and communication activities should be incorporated into the work plan.

ADMIN RECORD

Section 4.2.3.4: DOE has assumed that an exceedance of the 30-day moving average may occur on an occasional basis and can be addressed through "appropriate measures". DOE apparently has not considered what measures would be taken in the event the average is exceeded on a continual basis and pond levels continue to increase. DOE must be as specific as possible on the appropriate measures that would be used to alleviate this potential condition since remediation activities could contribute to increased radionuclide levels in surface waters. Emergency release procedures should not be the final answer to non-attainment of CWQCC standards for radionuclides.

Section 4.4.3.7: The Division welcomes the annual reviews of potentially applicable treatment technologies. Additionally, the Division would like the annual review to include an updated and revised schedule comparable to Figure 4.4-2. Likewise, the Division would like annual updates on the progress of improvements to DOE analytical capabilities; schedules for any additional work should be included.

Comments to Document Review Comment Record:

City of Broomfield, Item 2: DOE's response to this item regarding the transfer of Pond C-2 water to Pond B-5 is inadequate for two reasons. First, the clarifications referred to cannot be found in the paragraphs to which the City of Broomfield made reference (See Sections 3.3.1, 3.3.5 and 4.1.4). Although the Division recalls clarification of this issue elsewhere in the document, the above referenced sections remain contradictory. Second, the potential for routing Pond C-2 water to Pond B-5, at any time prior to the abandonment of Great Western Reservoir as a drinking water source, has been ignored. Although the water from Pond C-2 currently goes into the Broomfield Diversion Ditch, the City of Broomfield is reserving the right to draw water from Walnut Creek and is not agreeable to water from Woman Creek being diverted into Walnut Creek. This concern must be resolved and set forth within the work plan.